NORTHERN DISTRICT COURT NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

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OLLIE GREENE, Individually as the Surviving Parent of WYNDELL GREENE, SR., WILLIAM GREENE, as the Administrator of the Estate of WYNDELL GREENE, SR., and MARILYN BURDETTE-HARDEMAN, Individually and as the Surviving Parent of LAKEYSHA GREENE D;

Plaintiffs

Defendants.

v.

TOYOTA MOTOR CORPORATION,
TOYOTA MOTOR MANUFACTURING
NORTH AMERICA, INC., TOYOTA
MOTOR SALES USA, INC., VOLVO
GROUP NORTH AMERICA, LLC, VOLVO
TRUCKS NORTH AMERICA, A DIVISION
OF VOLVO GROUP NORTH AMERICA,
LLC, STRICK TRAILERS, LLC, JOHN
FAYARD MOVING & WAREHOUSE, LLC
and DOLPHIN LINE, INC.

CAUSE NUMBER: 3:11-cv-0207-N

JURY TRIAL DEMANDED

SUPPLEMENTAL OBJECTIONS TO PLAINTIFFS' SECOND AMENDED EXHIBIT LIST BY DEFENDANT DOLPHIN LINE, INC.

Defendant Dolphin Line, Inc., hereby files its Supplemental Objections to Plaintiffs' Second Amended Exhibit List (Doc. 705), as set forth below:

Ex.	Pls' Description	Objections	G	D
I .	Photo of Lakeysha Greene laying in the roadway	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		

Pls' Description	Objections	G	D
Photo of Toyota SUV burning at accident site	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
Kaufman County Records Affidavit of 9-1-1 calls	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
Photo of Greene child charred remains	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		
Photo2 of Greene child charred remains	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		
Photo of wreckage and blood on roadway	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		
Photo of charred remains being removed from Toyota 4Runner	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		
Photo of rear of Toyota 4Runner at accident site	Objection Withdrawn		
Photo of side of Toyota 4Runner at accident site	Objection Withdrawn		
Photo of rear of Dolphin-Strick trailer at accident site	Objection Withdrawn		
Photo of ICC Rear Impact Guard laying in roadway	Objection Withdrawn		
Photo2 of ICC Rear Impact Guard laying in roadway	Objection Withdrawn		
Intentionally Omitted			
Photo of mud-flap on Dolphin Trailer at accident site	Objection Withdrawn		
Close-up of photo2 of mud-flap on Dolphin Trailer at accident site	Objection Withdrawn		
Photo of the Volvo tractor's front grill at accident site	Objection Withdrawn		
Photo of front of Volvo truck at accident site	Objection Withdrawn		
Intentionally Omitted			
Intentionally Omitted			
II OH II	Caufman County Records Affidavit of 9-1-1 calls Photo of Greene child charred remains Photo of Greene child charred remains Photo of wreckage and blood on roadway Photo of charred remains being removed from Toyota 4Runner Photo of rear of Toyota 4Runner at accident site Photo of side of Toyota 4Runner at accident site Photo of rear of Dolphin-Strick trailer at accident site Photo of ICC Rear Impact Guard laying in oadway Photo2 of ICC Rear Impact Guard laying in oadway Intentionally Omitted Photo of mud-flap on Dolphin Trailer at accident site Close-up of photo2 of mud-flap on Dolphin Trailer at accident site Photo of the Volvo tractor's front grill at accident site Photo of front of Volvo truck at accident site Photo of front of Volvo truck at accident site	Kaufman County Records Affidavit of 9-1-1 Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901 Photo of Greene child charred remains Photo of wreckage and blood on roadway Photo of wreckage and blood on roadway Photo of charred remains being removed from Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901 Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901 Photo of charred remains being removed from Foyota 4Runner Photo of rear of Toyota 4Runner at accident site Photo of side of Toyota 4Runner at accident site Photo of rear of Dolphin-Strick trailer at accident site Photo of ICC Rear Impact Guard laying in oadway Photo2 of ICC Rear Impact Guard laying in oadway Photo3 of ICC Rear Impact Guard laying in oadway Photo4 of ICC Rear Impact Guard laying in oadway Photo5 of ICC Rear Impact Guard laying in oadway Photo5 of ICC Rear Impact Guard laying in oadway Photo6 of ICC Rear Impact Guard laying in oadway Photo7 of ICC Rear Impact Guard laying in oadway Photo8 of ICC Rear Impact Guard laying in oadway Photo9 of ICC Rear Impact Guard laying in oadway Photo9 of ICC Rear Impact Guard laying in objection Withdrawn Intentionally Omitted Photo of the Volvo tractor's front grill at accident site Photo of front of Volvo truck at accident site Photo of front of Volvo truck at accident site Photo of front of Volvo truck at accident site Photo of front of Volvo truck at accident site Photo of front of Volvo truck at accident site Photo of front of Volvo truck at accident site Photo of front of Volvo truck at accident site Photo of front of Volvo truck at accident site Photo of front of Volvo truck at accident site	Fed. R. Evid. 802, 901

Ex.	Pls' Description	Objections	G	D
21	Invoice for Repair of ICC bar by Gulf City Body and Trailer Works, Inc.	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 802, 901		
22	Quotation for Repair of ICC bar by Gulf City Body and Trailer Works, Inc.	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 802, 901		
23	Photo of rear of Strick Trailer after repair by Gulf City Body and Trailer Works, Inc.	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 802, 901		
24	Intentionally Omitted			
25	Intentionally Omitted			
26	Accident Report dated June 1, 2010, from Daniel Sprinkle of May 28, 2010, accident	Objection Withdrawn		
27	Photos of rear of Strick trailer after accident - taken by John Fayard Moving	Objection Withdrawn		
28	Fayard's Net Worth [CONFIDENTIAL]	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403		1
29	April 6, 2010 Dolphin Repair Order	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 802, 901		
30	List of Trailers owned by Dolphin	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 802, 901		
31	Exemplar of Dolphin Broker Carrier Agreement, such as the one with Fayard Moving and Warehouse	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 802, 901		
32	Delivery receipt from RC Trailers for delivery of Strick Trailers to Dolphin	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 802, 901		
33	Financial statements of Dolphin Line Inc. [CONFIDENTIAL]	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403		
34	July 10, 2007 Dolphin Repair Order	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 901		
35	February 29, 2008 Dolphin Repair Order	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 802, 901		
36	July 2, 2008 Dolphin Repair Order	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 802, 901		

Ex.	Pls' Description	Objections	G	D
37	April 6, 2010 Dolphin Repair Order	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 802, 901		
38	Intentionally Omitted			
39	Email from Todd Parks with deposition subjects for Strick designees and notification of production of exemplar trailer	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 802, 901		
40	Strick Invoice dated February 10, 2003 with RC Trailers	Objection Withdrawn		
41	Strick Invoice with RC Trailers, signed by all	Objection Withdrawn		
42	Strick Sales Order Specifications for RC Trailers Order	Objection Withdrawn		
	Press Release from Insurance Institute for Highway Safety – Underride guards on big rigs fail in crashes; Institute petitions government for new standard	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 802, 901		
44	Letter to NHTSA from Insurance Institute for Highway Safety re: petitioning the government for new standard for underride guards	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 802, 901		
45	Underride Crashes: Status Report from Insurance Institute for Highway Safety	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 802, 901		
46	April 14, 1993, memo from NHTSA regarding Rear Impact guards	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 802, 901		
47	Email among Strick officers regarding the Torcominian Patent's Underride Guard	Objection Withdrawn		
48	Strick Trailer Care and Maintenance Manual	Objection Withdrawn		
49	Strick Trailer Care and Maintenance Manual - Updated Dec 2011	Objection Withdrawn		
50	Strick's Manufacturer's Certification Label	Objection Withdrawn		
51	Strick flyer – acknowledging that aftermarket and parts distributor is New Life Transport Parts Center	Objection Withdrawn		
52	Strick's Dealers Names and Locations	Objection Withdrawn		
53	Strick's Parts Nomenclature from New Life Transport Center	Objection Withdrawn		

Ex.	Pls' Description	Objections	G	D
54	ICC Complete Assembly Orders	Objection Withdrawn		
55	Strick Letter dated June 19, 1998 to customers to retrofit guards to new standards	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
56	Cost Bill of Materials for Rear of Strick Trailer	Objection Withdrawn		
57	Photo1 taken May 14, 2012 of Strick Trailer manufactured under Canadian Standards	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901 Supplemental Objections:		
		Fed R. Evid. 401, 402, 403		
58	Photo2 taken May 14, 2012 of Strick Trailer manufactured under Canadian Standards	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
		Supplemental Objections: Fed R. Evid. 401, 402, 403		
59	Photo3 taken May 14, 2012 of Strick Trailer manufactured under Canadian Standards	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
		Supplemental Objections: Fed R. Evid. 401, 402, 403		
60	Strick diagram showing an ICC guard with rounded end	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
61	Canadian Motor Vehicle 223 Standards effective 2005	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
62	List of Underride cases in which Strick has been involved	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		
63	Strick Record Retention Policy	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		
64	April 6, 2012 Supplemental Discovery Request to Strick	Fed. R. Civ. P. 26(a)(3)(a)(iii) Supplemental Objections: Fed. R. Evid. 401, 402, 403		
65	Strick Balance Sheet [CONFIDENTIAL]	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
66	Canadian Motor Vehicle 223 Test Methods dated 2003	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901 Supplemental Objections: Fed. R. Evid. 401, 402, 403		
67	Strick 1995 Rear Impact Guard Testing Report	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		

Ex.	Pls' Description	Objections	G	D
68	Karco Testing Report for Strick Trailers submitted to NHTSA 1999	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
69	Texas Peace Officer's Report prepared by Trooper Barkley	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
70	Excerpt from Texas Peace Officer's Report prepared by Trooper Clint Baughman	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
71	Excerpt2 from Texas Peace Officer's Report prepared by Trooper Clint Baughman	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
72	Annual Vehicle Inspection Report for Dolphin Tractor	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
73	Crash Investigation Report from Texas Peace Officer's Report prepared by Trooper Clint Baughman regarding John Fayard Moving & Storage	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
74	Supplemental Investigation report with information obtained from Trooper Barclay	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
75	Intentionally Omitted			
76	Intentionally Omitted			
77	Intentionally Omitted			
78	IIHS Status Report dated April 17, 2008 re: Crash Avoidance Technologies	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
79	Intentionally Omitted			
80	Intentionally Omitted			
81	Intentionally Omitted			
82		Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
83	National Transportation Safety Board's Most Wanted List - Mandate Motor Vehicle Collision Avoidance Technologies	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
	National Transportation Safety Board's investigation of Truck-Tractor Semitrailer Rear-end Collision into Passenger Vehicles on Interstate 44 Near Miami, Oklahoma June 26, 2009	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
85	Intentionally Omitted			
86	Intentionally Omitted			

Ex.	Pls' Description	Objections	G	D
87	Intentionally Omitted			
88	Intentionally Omitted			
89	Intentionally Omitted			
90	Intentionally Omitted			
91	Intentionally Omitted			
92	Intentionally Omitted		<u> </u>	
93	NHTSA's Vehicle Compatibility Research Program	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
94	Intentionally Omitted			
95	Intentionally Omitted			
96	Intentionally Omitted			
97	Intentionally Omitted			
98	Intentionally Omitted			
99	Intentionally Omitted			
100	Intentionally Omitted			
101	Intentionally Omitted			
102	Intentionally Omitted			
103	Intentionally Omitted			
104	Intentionally Omitted			
105	Photo of Volvo truck at accident site (passenger side view)	Objection Withdrawn		
106	Photo of Volvo truck at accident site (front end view)	Objection Withdrawn		
107	Photo of Volvo truck at accident site (showing front end and grill)	Objection Withdrawn		
108	Intentionally Omitted			
109	Intentionally Omitted			
110	Intentionally Omitted			
111	Intentionally Omitted			
	Photo of remaining parts of Volvo tractor bumper taken at inspection	Objection Withdrawn		
113	Intentionally Omitted			
114	Intentionally Omitted			
115	Intentionally Omitted			

Ex.	Pls' Description	Objections	G	D
116	Intentionally Omitted			
117	Article - First Order Analysis for Automotive Body Structure Design	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
118	Article - Application of Crash Simulation to Vehicle Development	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
119	Passive Safety - Toyota's use of CAE and FEM	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
1 1 1 1 1 1 1	Document Retention Policy for Toyota Motor Corporation	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
121	The Study of the Frontal Compatibility of Consideration of Interaction and Stiffness	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
122	THUMS Total HUman Model for Safety article	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
123	THUMS Total HUman Model for Safety 2011 article	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
124	Simulation of Occupant Motion in Rear Impacts using Human FE Model THUMS	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
125	Intentionally Omitted			
126	Letter dated March 4, 1992 from Saburo Inui to NHTSA discussing FMVSS 210 and manufacturer's freedom on designs	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		
127	Photograph of undercarriage of 2010 Toyota 4Runner prepared for NCAP testing	Objection Withdrawn		
128	Photo of undercarriage of Toyota 4Runner Trail model (from Toyota Brochure)	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
	Narrative of Fuel System from Toyota 4Runner Brochure	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
130	Narrative and diagram of Fuel Tank components (from Toyota 4Runner Brochure)	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
1 2 2 2	Letter dated March 5, 1993 from Saburo Inui to NHTSA discussing FMVSS 301 and standards for testing tanks	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
1 1771	Narrative and diagram of SRS airbags (from 2010 Toyota Brochure)	Fed. R. Civ. P. 26(a)(3)(a)(iii)		

Ex.	Pls' Description	Objections	G	D
133	Toyota press release of recall of RAV4 and Highlander vehicles to replace curtain shield airbag sensor assembly	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
134	Toyota press release of recall of 2011 RAV4 vehicles to replace curtain shield airbag initiator assembly	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
135	Picture showing the burning Toyota 4Runner	Objection Withdrawn		
136	Intentionally Omitted			
137	Toyota Motor Sales' Document Retention Policy	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
138	Toyota 4Runner Ad (No Intelligent Life Out There)	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
139	Toyota 4Runner ad (Rise Above Ordinary)	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
140	Website advertising of Toyota 4Runner	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
141	September 24, 2009, Press Release announcing launch of 2010 4Runner	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
142	Internet article of Press Release regarding debut of Toyota 4Runner in Dallas	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
143	Sales brochure for 2011 4Runner	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
144	Sales brochure for 2010 4Runner	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
145	Toyota Pocket Source Brochure for 2010 4Runner	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
146	Intentionally Omitted			
147	Copy of Toyota advertisement (spending a million dollars per hour)	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
148	Toyota 4Runner ad (Star Safety)	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
149	Toyota 2010 Organizational Chart	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
150	Toyota Press Release of r ecall of selected Lexus models	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
151	Toyota Press Release of recall of 4Runners and other vehicle in Southeast Region for Seat Occupant Sensing System	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
152	Toyota Press Release of recall of certain vehicles for passenger airbag inflator problems	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
	Manufacturers Motor Vehicle Specifications for 2010 4Runner	Fed. R. Civ. P. 26(a)(3)(a)(iii)		

Ex.	Pls' Description	Objections	G	D
154	Toyota 4Runner Owners Warranty Rights Notification	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
155	Main Vehicle Inquiry showing logistics and building of the Greene 4Runner	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
156	Service Serial Master Inquiry for Greene 4Runner	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
157	Texas Dept. of Motor Vehicle history for the Greene 4Runner	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
158	Monroney Label (Sticker Label) for Greene 4Runner	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
159	Toyota Organizational Chart for 2013	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
160	Mills Accident Report	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 901 Supplemental Objections: Fed. R. Evid. 802		
161	Diab Accident Report	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 901 Supplemental Objections: Fed. R. Evid. 802		
162	Baker Accident Report	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 901 Supplemental Objections: Fed. R. Evid. 802		
163	Puga Accident Report	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 901 Supplemental Objections: Fed. R. Evid. 802		
164	Schiller Accident Report	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 901 Supplemental Objections: Fed. R. Evid. 802		
165	Snelgrove Accident Report	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 901 Supplemental Objections: Fed. R. Evid. 802		
166	Photo of accident site (Exhibit 1 from Brian Thompson Deposition)	Objection Withdrawn		
	Recall letter from NHTSA dated June 25, 2010 of 2010 Lexus HS for noncompliance with FMVSS 301	Fed. R. Civ. P. 26(a)(3)(a)(iii)		

Ex.	Pls' Description	Objections	G	D
168	Toyota's July 27, 2010 letter to NHTSA responding to recall notice re 2010 Lexus HS for noncompliance with FMVSS 301	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
169	Scale diagram of accident scene received from Texas Highway Patrol Division	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
170	Information regarding Stop-Sale Order on Toyota Automobiles from U.S., Canada over Flammable Seat Fabric	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
171	Intentionally Omitted			
172	Intentionally Omitted			
173	Intentionally Omitted			
174	NHTSA Publication – Traffic Safety Facts 2006 Data (bates no. GREENE_006711-15	Supplemental Objections: Fed R. Evid. 401, 402, 802		
175	Toyota Press Release confirming more than 2.2 million vehicles sold in U.S. in 2008.	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
176	Announcement: Toyota Launches New Product Leadership Campaign with its agency Saatchi & Saatchi.	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
	Ad with mom holding a baby - No matter who you are or what you drive, everyone deserves to be safe	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
178	Ad from front page of Yahoo, shown nationwide, depicting a woman holding a baby and figures of a family of four and the slogan "Everyone deserves safety."	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
179	Ad depicting minorities standing behind Toyota's "everyone deserves to be safe" claim.	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802		
180	National ad portraying actor (or employee) who is represented to be a female Automotive Engineer with Toyota.	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
181	National ad portraying actor (or employee) who is represented to be a minority male Automotive Engineer at Toyota.	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
182	National ad portraying actor (or employee) who is represented to be the Chief Engineer at Toyota.	Fed. R. Civ. P. 26(a)(3)(a)(iii)		

Ex.	Pls' Description	Objections	G	D
183	National ad alleging that Toyota has set up "Smart Teams," comprising "200 highly trained engineers and technical experts.	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
	National ad alleging that Toyota has set up "Smart Teams," includes an endorsement from Toyota's "Chief Quality Officer,"	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
185	Toyota T.V. ad depicting a couple, and announcing that Toyota is recognized for being safe.	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
186	Toyota T.V. ad depicting small children, and announcing that Toyota is recognized for being safe.	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
187	Toyota T.V. ad depicting a family of four, and announcing that Toyota is recognized for being safe.	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
188	Toyota T.V. ad depicting an African-American family with kids, and announcing that Toyota is recognized for being safe.	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
189	Toyota T.V. ad with a tagline announcing that Toyota is recognized for being safe.	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
	Toyota T.V. ad with a tagline announcing that "no other brand has won more (safety awards)."	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
191	National ad - spending \$1 million an hour on safety is displayed prominently on the commercial.	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 802, 901		
192	Rollover Ratings for Midsize SUV's prepared by Insurance Institute for Highway Safety, Highway Loss Data Institute.	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
	February 24, 2010, testimony of Toyota's CEO, Akio Toyoda, before the U.S. House Committee on Oversight and Government Reform.	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
1101	February 9, 2010 Op-Ed in the Washington Post written by Toyota's CEO, Akio Toyoda.	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
1 1/15	Press Release: Toyota paid \$1.6 billion to settle claims related to certain recalls.	Fed. R. Civ. P. 26(a)(3)(a)(iii)		

Ex.	Pls' Description	Objections	G	D
	Press release: Toyota paid a record \$16.4 million fine to the U.S. government for failing to quickly report safety problems.	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
197	Toyota recall in 2010 of thousands of the 2010 Lexus HS 250h due to deadly fuel leaks after collisions	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
198	Toyota recall of the Lexus GS, IS 250 and IS 350 models in the United States due to potential cracks in fuel pipes.	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
199	Toyota recall of 2009-2012 4Runners, Sequoias, and other vehicles because Toyota failed to test the passenger seat occupant sensing system calibration.	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
200	Toyota recall of hundreds of thousands of RAV4 and Highlander SUVs due to defective curtain shield airbags.	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
	Toyota recall of more RAV4 and Highlander SUV models for defective side curtain shield airbags.	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
202	Toyota recalls Corolla, Sequoia, Tundra vehicles for defective airbag inflators.	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
203	Toyota press releases confirming that Toyota has had over thirty-five (35) recalls over the last 2-3 years on all of its models for various safety issues.	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
204	Toyota ad depicting that the 4Runner is used off-road.	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
205	Toyota ad depicting the 4Runner being used for racing.	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
206	Toyota ad - 4Runner has maximum ground clearance.	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
	Toyota ad of the undercarriage of 2010 Toyota 4Runner 4x4 version - bates SSTSUB13-00166	Fed. R. Evid. 802		
208	Toyota d stating that the 4Runner can "take on any road to anywhere."	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
209	Toyota advertised the 4Runner as "one of the most trustworthy vehicles on the road."	Fed. R. Civ. P. 26(a)(3)(a)(iii)		

Ex.	Pls' Description	Objections	G	D
210	2010 article noting that Toyota's safety campaign was being blitzed all over the country on virtually every network.	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
211	Advertisement for Toyota 4Runner - "take daily nonstop to the middle of nowherethen return home to tell us about it thanks to the Star Safety System."	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
212	Official Justice Department Press Release Announcing Criminal Charge Against Toyota Motor Corporation and Deferred Prosecution Agreement with \$1.2 Billion Financial Penalty	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
213	Official Justice Department Deferred Prosecution Agreement regarding Criminal Charge Against Toyota Motor Corporation and Deferred Prosecution Agreement with \$1.2 Billion Financial Penalty	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
214	Official Justice Department Statement of Facts regarding Criminal Charge Against Toyota Motor Corporation and Deferred Prosecution Agreement with \$1.2 Billion Financial Penalty	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
215	Toyota Automotive Safety Manual – Bates number 86845-86892	FED. R. EVID. 802		
216	Slideshow presentation (first 10 pages) – http://www.sc.toyotafinancial.com/web/tfs/pub/contents/investorRelations/Investor%20Prese n tation%20April%202013.pdf	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
217	Letter dated June 14, 2010 from Toyota Financial Services regarding amount to be paid to Toyota as a result of the loss of the 4Runner	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
218	Toyota's Annual Report (Form 20-F) for 2010, pursuant to Section 13 of the SEC Act of 1934 (bate-numbers 847962-848163)			
219	Intentionally Omitted			
220	Intentionally Omitted			
221	Intentionally Omitted			
	Intentionally Omitted			
223	Intentionally Omitted			

Ex.	Pls' Description	Objections	G	D
224	Intentionally Omitted			
225	Intentionally Omitted			
226	Intentionally Omitted			
227	Intentionally Omitted			
228	Intentionally Omitted			
229	NHTSA's 2012 Vehicle Recalls by Manufacturer	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
230	Intentionally Omitted			
231	Intentionally Omitted			
232	Intentionally Omitted			
233	Intentionally Omitted			
234	Intentionally Omitted			
235	Intentionally Omitted			
236	Intentionally Omitted			
237	Intentionally Omitted			
238	Intentionally Omitted			
239	Intentionally Omitted			
240	Intentionally Omitted			
241	National Transportation Safety Board's Most Wanted List - Mandate Motor Vehicle Collision Avoidance Technologies	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
242	Intentionally Omitted			
243	Intentionally Omitted			
244	Photo of rear of Dolphin-Strick trailer - GREENE_002101	Objection Withdrawn		
245	Photo of underside of Dolphin-Strick trailer - GREENE_002238	Objection Withdrawn		
246	Information from Strick's membership group and NHTSA regarding potential costs and benefits of underride guards	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
247	Strick Trailer's February 2, 1998 Testing Report for "16" Weld-on Bumper Gusset"	Fed. R. Civ. P. 26(a)(3)(a)(iii)		

Ex.	Pls' Description	Objections	G	D
248	Department of Public Safety Photos (bates no. Toyota 00007-00080)	Fed. R. Evid. 802 Supplemental Objections: Fed. R. Evid. 401, 402, 403		
249	WFAA News scene photograph (bates no. Toyota_00131)	Fed. R. Evid., 901, 802 Supplemental Objections: Fed. R. Evid. 401, 402, 403		
250	Autopsy of Lakeysha Greene	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403		
251	Autopsy of Wyndell Greene, Sr.	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403		,
	Recording of Kaufman County 9-1-1 call: 025_2010_05_28_182454699 (confirmed by Plaintiffs' Ex. 3)	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901 Supplemental Objections: Fed. R. Evid. 401, 402, 403		
	Recording of Kaufman County 9-1-1 call: 022_2010_05_28_182454261(confirmed by Plaintiffs' Ex. 3)	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901 Supplemental Objections: Fed. R. Evid. 401, 402, 403		
254	Recording of Kaufman County 9-1-1 call: 005_2010_05_28_183041417(confirmed by Plaintiffs' Ex. 3)	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901 Supplemental Objections: Fed. R. Evid. 401, 402, 403		
233	Recording of Kaufman County 9-1-1 call DISPATCHING Elmo Fire and Rescue: 023_2010_05_28_182733167(confirmed by Plaintiffs' Ex. 3)	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901 Supplemental Objections: Fed. R. Evid. 401, 402, 403		
256	Affidavit of Texas Department of Transportation Crash Report	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 901 Supplemental Objections: Fed. R. Evid. 401, 402, 403		
258	Medical Examiner's tagged photographs of Wyndell Greene, Sr. (with private parts redacted) (bates no. GREENE_006468-006470)	Fed. R. Evid. 802 Supplemental Objections: Fed. R. Evid. 401, 402, 403		
	Medical Expenses from Air Evac Lifeteam to transport Wyndell Greene, Sr. on May 28, 2010	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
261	Medical Expenses from Centennial Medical Center	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
	Photos at accident site (bates no. GREENE_000400-000407)	Objection Withdrawn		

Ex.	Pls' Description	Objections	G	D
263	Dairy entries in Caring Bridge journal (bates no. GREENE_000432-000453)	Fed. R. Evid. 802		
265	Affidavit of Reasonable and Necessary Medical Services from Parkland Hospital (part 1 of 8)	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 901		
266	Affidavit of Reasonable and Necessary Medical Services from Parkland Hospital (part 2 of 8)	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 901		
267	Affidavit of Reasonable and Necessary Medical Services from Parkland Hospital (part 3 of 8)	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 901		
268	Affidavit of Reasonable and Necessary Medical Services from Parkland Hospital (part 4 of 8)	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 901		
269	Affidavit of Reasonable and Necessary Medical Services from Parkland Hospital (part 5 of 8)	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 901		
270	Affidavit of Reasonable and Necessary Medical Services from Parkland Hospital (part 6 of 8)	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 901		
271	Affidavit of Reasonable and Necessary Medical Services from Parkland Hospital (part 7 of 8)	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 901		
1	Affidavit of Reasonable and Necessary Medical Services from Parkland Hospital (part 8 of 8)	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 901		
	Summary of Wyndell Greene medical expenses paid by Meridian Resource on behalf of Lakeysha Greene	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
274	ETMC EMS Patient Care Records for Wyndell Greene on May 28, 2010	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
275	Dairy entries in Caring Bridge journal (bates no. GREENE_002494-002726)	Fed. R. Evid., 901, 802		
276	Lakeysha and Wyndell Greene wedding photo	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		
277	Photo of Wesleigh Greene at birth	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		

Ex.	Pls' Description	Objections	G	D
278	Photo of Wesleigh Greene with her father as he works	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		
279	Photo of Wesleigh Greene at 1st birthday party	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		
280	Photo of Wyndell Greene, Sr. teaching Wesleigh to swim	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		
281	Wesleigh Greene's writings and drawings to her mother	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		
282	Wesleigh Greene's writings and drawings to her mother and father	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		
283	Wyndell Greene, Sr. and Wesleigh Greene at Daughter-Daddy dance	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		
284	Photo of Wesleigh Greene dressed for birthday party	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		
285	Photo of Wyndell Greene, II at childbirth	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		
286	Photo of Wyndell "Kyle" Greene, II	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		
287	Photo of Wesleigh Greene	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		
288	Photo of Wesleigh and Kyle Greene	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		
289	Short video of Wesleigh Greene	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		
290	Short video of Wyndell Kyle Greene, II	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		

Ex.	Pls' Description	Objections	G	D
291	Greene Family Photo	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		
292	Photo of Wesleigh Greene and teacher	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		
293	Wesleigh Greene and classmates	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		
294	Greene Family Photo	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		
295	Greene Family Photo	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		
296	Photo of Mrs. Marilyn Hardeman and grandkids	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		
297	Photo of Mrs. Ollie Greene and Wesleigh	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		
298	Memorial Service video for Lakeysha, Wesleigh, and Wyndell Greene, II (bates no. GREENE_006435)	Fed. R. Evid., 901, 802, 401, 402, 403		
299	Printed Memorial Service Program for Lakeysha, Wesleigh, and Wyndell Greene, II	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		
300	Video portrait of the Greene family (bates no. GREENE_006716)	Fed. R. Evid., 901, 802, 401, 402, 403		
301	Video of balloon send-off for Wesleigh Greene from classmates (bates no. GREENE_000455)	Fed. R. Evid., 901, 802, 401, 402, 403		
302	Funeral expenses for Lakeysha, Wesleigh, and Kyle funeral	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		
303	Photo of gravestone for Lakeysha, Kyle and Wesleigh Greene	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		
304	Wyndell Greene's funeral program	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		

Ex.	Pls' Description	Objections	G	D
305	Video 1 of interior and exterior of the Greene residence	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		
306	Video 2 of interior and exterior of the Greene residence	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		
307	Timeline of critical dates	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		
308	Dr. Darrell Henderson's Expert Report	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
309	Curriculum Vitae and testimony list for Dr. Darrell Henderson	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
310	Photo 1 of Wyndell Greene in Burn Unit (bates no. GREENE_000387-000399)	Fed. R. Evid., 901, 802, 401, 402, 403		
311	Photo 2 of Wyndell Greene in Burn Unit (bates no. GREENE_000387-000399)	Fed. R. Evid., 901, 802, 401, 402, 403		
312	Photo 3 of Wyndell Greene in Burn Unit (bates no. GREENE_000387-000399)	Fed. R. Evid., 901, 802, 401, 402, 403		
313	Photo 4 of Wyndell Greene in Burn Unit (bates no. GREENE_000387-000399)	Fed. R. Evid., 901, 802, 401, 402, 403		
314	Photo 5 of Wyndell Greene in Burn Unit (bates no. GREENE_000387-000399)	Fed. R. Evid., 901, 802, 401, 402, 403		
315	Photo 6 of Wyndell Greene in Burn Unit (bates no. GREENE_000387-000399)	Fed. R. Evid., 901, 802, 401, 402, 403		
316	Photo 7 of Wyndell Greene in Burn Unit (bates no. GREENE_000387-000399)	Fed. R. Evid., 901, 802, 401, 402, 403		
317	Photo 8 of Wyndell Greene in Burn Unit (bates no. GREENE_000387-000399)	Fed. R. Evid., 901, 802, 401, 402, 403		
318	Photo 9 of Wyndell Greene in Burn Unit (bates no. GREENE_000387-000399)	Fed. R. Evid., 901, 802, 401, 402, 403		
319	Skin and Burn Illustrations_0001	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
320	Skin and Burn Illustrations_0002	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
321	Skin and Burn Illustrations_0003	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		

Ex.	Pls' Description	Objections	G	D
322	Skin and Burn Illustrations_0004	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
323	Intentionally Omitted			
324	Intentionally Omitted			
325	Expert report of Dr. Trudi Zaplac	Fed. R. Civ. P. 26(a)(3)(a)(iii) Supplemental Objections: Fed R. Evid. 802		
326	Curriculum Vitae of Dr. Trudi Zaplac	Fed. R. Civ. P. 26(a)(3)(a)(iii) Supplemental Objections: Fed R. Evid. 802		
327	Expert report of Dr. Stan Smith	Fed. R. Civ. P. 26(a)(3)(a)(iii) Supplemental Objections: Fed R. Evid. 802		
328	Curriculum Vitae of Dr. Stan Smith and list of cases	Fed. R. Civ. P. 26(a)(3)(a)(iii) Supplemental Objections: Fed R. Evid. 802		
329	Wyndell and Lakeysha Greene Tax Returns 2005-2010	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		
330	Wyndell Greene payroll records - ACCENTURE, LLP EMPLOYMENT AND PAYROLL RECORDS VOL. 1 OF 2	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		
331	Wyndell Greene payroll records - ACCENTURE, LLP EMPLOYMENT AND PAYROLL RECORDS VOL. 2 OF 2	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		
332	Wyndell Greene payroll records - Merrill Lynch	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		
333	Lakeysha Greene payroll records – Accenture, Vol 1 of 3	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		
334	Lakeysha Greene payroll records – Accenture, Vol 2 of 3	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		
335	Lakeysha Greene payroll records – Accenture, Vol 3 of 3	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		
336	Lakeysha Greene payroll records - PepsiCo	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		

Ex.	Pls' Description	Objections	G	D
337	Expert report of Jeff Vick	Fed. R. Civ. P. 26(a)(3)(a)(iii) Supplemental Objections: Fed R. Evid. 802		
338	Curriculum Vitae of Jeff Vick	Fed. R. Civ. P. 26(a)(3)(a)(iii) Supplemental Objections: Fed R. Evid. 802		
339	On-Site Photo DSC07094	Objection Withdrawn		
340	On-Site Photo DSC07096	Objection Withdrawn		
341	On-Site Photos DSC07102 and DSC07123	Objection Withdrawn		
342	On-Site Photos DSC07104 and DSC07128	Objection Withdrawn		
343	On-Site Photo DSC07105 and DSC07129	Objection Withdrawn		
344	On-Site Photo DSC07106 and DSC 07130	Objection Withdrawn		
345	On-Site Photo DSC07107 and DSC07136	Objection Withdrawn		
346	On-Site Photo DSC07111	Objection Withdrawn		
347	On-Site Photo DSC07114	Objection Withdrawn		
348	On-Site Photo DSC07116	Objection Withdrawn		
349	On-Site Photo DSC07118	Objection Withdrawn		
350	On-Site Photo DSC07122	Objection Withdrawn		
351	On-Site Aerial Photo MG_6717_4000	Objection Withdrawn		
352	On-Site Photo of accident fire	Objection Withdrawn		
353	On-Site Photo1 of vehicles at rest	Objection Withdrawn		
354	On-Site Photo2 of vehicles at rest	Objection Withdrawn		
355	On-Site Photo3 of vehicles at rest	Objection Withdrawn		
356	On-Site Photo4 of vehicles at rest	Objection Withdrawn		
357	On-Site Photo5 of vehicles at rest	Objection Withdrawn		
358	On-Site Photo6 of vehicles at rest	Objection Withdrawn		
359	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01038	Objection Withdrawn		
741	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01039	Objection Withdrawn		
7411	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01042	Objection Withdrawn		
747 1	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01043	Objection Withdrawn		

Ex.	Pls' Description	Objections	G	D
363	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01045	Objection Withdrawn		
364	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01046	Objection Withdrawn		
365	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01047	Objection Withdrawn		
366	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01051	Objection Withdrawn		
367	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01053	Objection Withdrawn		
368	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01055	Objection Withdrawn		
369	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01056	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901 Supplemental Objections: Fed. R. Evid. 403		
370	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01057	Objection Withdrawn		
371	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01059	Objection Withdrawn		
372	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01060	Objection Withdrawn		
373	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01063	Objection Withdrawn		
374	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01064	Objection Withdrawn		
375	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01065	Objection Withdrawn		
376	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01068	Objection Withdrawn		
377	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01069	Objection Withdrawn		
378	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01070	Objection Withdrawn		
379	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01072	Objection Withdrawn		

Ex.	Pls' Description	Objections	G	D
380	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01073	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901 Supplemental Objections: Fed. R. Evid. 403		
381	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01074	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901 Supplemental Objections: Fed. R. Evid. 403		
382	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01075	Objection Withdrawn		
383	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01076	Objection Withdrawn		
384	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01077	Objection Withdrawn		
385	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01083	Objection Withdrawn		
386	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01084	Objection Withdrawn		
387	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01099	Objection Withdrawn		
388	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01101	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901 Supplemental Objections: Fed. R. Evid. 403		
389	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01102	Objection Withdrawn		
390	Texas Dept. of Public Safety - Highway Patrol on-scene photo DSC01103	Objection Withdrawn		
391	Toyota 4Runner Photo DSC06488	Objection Withdrawn		
392	Toyota 4Runner Photo DSC06489	Objection Withdrawn		
393	Toyota 4Runner Photo DSC07419	Objection Withdrawn		
394	Toyota 4Runner Photo DSC07420	Objection Withdrawn		
395	Toyota 4Runner Photo DSC07421	Objection Withdrawn		
396	Toyota 4Runner Photo DSC07422	Objection Withdrawn		
	Toyota 4Runner Photo DSC07423	Objection Withdrawn		
398	Toyota 4Runner Photo DSC07424	Objection Withdrawn		

Ex.	Pls' Description	Objections	G	D
399	Toyota 4Runner Photo DSC07426	Objection Withdrawn		
400	Toyota 4Runner Photo DSC07427	Objection Withdrawn		
401	Toyota 4Runner Photo DSC07428	Objection Withdrawn		
402	Toyota 4Runner Photo DSC07434	Objection Withdrawn		
403	Toyota 4Runner Photo DSC07435	Objection Withdrawn		
404	Toyota 4Runner Photo DSC07436	Objection Withdrawn		
405	Toyota 4Runner Photo DSC07437	Objection Withdrawn		
406	Toyota 4Runner Photo DSC07438	Objection Withdrawn		
407	Toyota 4Runner Photo DSC07456	Objection Withdrawn		
408	Toyota 4Runner Photo DSC07457	Objection Withdrawn		
409	Toyota Corolla Photo DSC07468	Objection Withdrawn		
410	Toyota 4Runner Photo DSC07470	Objection Withdrawn		
411	Toyota 4Runner Photo DSC07634	Objection Withdrawn		
412	Toyota Corolla Photo DSC07550	Objection Withdrawn		
413	Toyota Corolla Photo DSC07551	Objection Withdrawn		
414	Toyota Corolla Photo DSC07552	Objection Withdrawn		
415	Toyota Corolla Photo DSC07553	Objection Withdrawn		
416	Toyota Corolla Photo DSC07554	Objection Withdrawn		
417	Toyota Corolla Photo DSC07562	Objection Withdrawn		
418	Toyota Corolla Photo DSC07568	Objection Withdrawn		
419	Toyota Corolla Photo DSC07583	Objection Withdrawn		
420	Toyota Corolla Photo DSC07586	Objection Withdrawn		
421	Toyota Corolla Photo DSC07595	Objection Withdrawn		
422	Toyota Corolla Photo DSC07597	Objection Withdrawn		
423	Toyota Corolla Photo DSC07604	Objection Withdrawn		
424	Toyota Corolla Photo DSC07611	Objection Withdrawn		
425	Toyota Corolla Photo DSC07655	Objection Withdrawn		
426	Toyota Corolla Photo DSC07656	Objection Withdrawn		
427	Toyota Corolla Photo DSC07662	Objection Withdrawn		
428	Toyota Corolla Photo DSC07663	Objection Withdrawn		
429	Volvo VN Tractor Photo DSC07261	Objection Withdrawn		
430	Volvo VN Tractor Photo DSC07263	Objection Withdrawn		

Ex.	Pls' Description	Objections	G	D
431	Volvo VN Tractor Photo DSC07264	Objection Withdrawn		
432	Volvo VN Tractor Photo DSC07266	Objection Withdrawn		
433	Volvo VN Tractor Photo DSC07357	Objection Withdrawn		
434	Volvo VN Tractor Photo DSC07358	Objection Withdrawn		
435	Volvo VN Tractor Photo DSC07360	Objection Withdrawn		
436	Volvo VN Tractor Photo DSC07381	Objection Withdrawn		
454	VinLink VIN information for Toyota 4Runner	Objection Withdrawn		
455	VinLink VIN information for Toyota Corolla	Objection Withdrawn		
456	2006 TOYOTA COROLLA 4 DOOR SEDAN AutoStats	Objection Withdrawn		
457	2010 TOYOTA 4RUNNER 4 DOOR 4X2 UTILITY AutoStats	Objection Withdrawn		
458	StifCalc Rear Impact Test Summary Report	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
459	StifCalc Rear Impact Test Summary Report- Utility vehicles	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
460	Equations and Calculations from Jeff Vick	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
461	Volvo Point of Perception - diagram	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
462	Volvo Braking Begins - diagram	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
463	Volvo 4 Runner Impact - diagram	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
464	4 Runner Corolla Impact - diagram	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
465	Volvo 4 Runner Corolla impact - diagram	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
466	4 Runner Volvo Separation - diagram	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
467	4 Runner Strick Trailer Impact - diagram	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
468	Strick Trailer Impact - diagram	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
469	Tool Box Impact - diagram	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		

Ex.	Pls' Description	Objections	G	D
470	Vehicle Final Rest Position - diagram	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
471	Texas Dept. of Public Safety - Highway Patrol Officer Measurements	Objection Withdrawn		
472	Friedman Research Expert Report - Toyota	Fed. R. Civ. P. 26(a)(3)(a)(iii) Supplemental Objections: Fed. R. Evid. 802		
473	Intentionally Omitted			
474	Friedman Research Expert Report - Strick	Fed. R. Civ. P. 26(a)(3)(a)(iii) Supplemental Objections: Fed. R. Evid. 802		
475	Friedman Research Expert Report – Fayard and Dolphin	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901 Supplemental Objections: Fed. R. Evid. 802		
476	Curriculum Vitae of Keith Friedman	Fed. R. Civ. P. 26(a)(3)(a)(iii) Supplemental Objections: Fed. R. Evid. 802		
477	Curriculum Vitae of Dr. R. Rhodes Stephenson	Fed. R. Civ. P. 26(a)(3)(a)(iii) Supplemental Objections: Fed. R. Evid. 802		
478	Fire bibliography – marked as Exhibit 6 to Dr. Stephenson deposition	Fed. R. Civ. P. 26(a)(3)(a)(iii) Supplemental Objections: Fed. R. Evid. 802		
479	Supplemental bibliography (marked as Exhibit 7 to Dr. Stephenson's deposition"	Fed. R. Civ. P. 26(a)(3)(a)(iii) Supplemental Objections: Fed. R. Evid. 802		
	Additional research considered (marked as Exhibit 8 to Dr. Stephenson's deposition)	Fed. R. Civ. P. 26(a)(3)(a)(iii) Supplemental Objections: Fed. R. Evid. 802		
481	Toyota ad directed towards consumers in Mr. Greene's demographic	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
482	The 2010 Toyota 4Runner	Objection Withdrawn		
483	Exemplar of fuel tank from 2010 Toyota 4Runner	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
484	Photo of dislodged underride guard (bates no. GREENE_000903)	Fed. R. Evid., 901, 802		
485	Photo of dislodged underride guard (bates no. GREENE_000904)	Fed. R. Evid., 901, 802		
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Ex.	Pls' Description	Objections	G	D
486	2010 Toyota 4Runner LF Quarter Panel Comparison between Replacement and Incident Vehicle	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
487	Comparison tank crush - Photo of end of tank to end of shield	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
488	Photos of Greene fuel tank damage and impacts from accident	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
489	photo of identification of 4Runner roof replacement	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
490	photo of impact of area of 4Runner with trailer	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
491	Photos of underride guard at accident scene	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
492	Photo of Greene vehicle at accident scene	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
493	Photos of examples of underride mountings	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
494	Photos of example in use underride guard	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
495	Repair quote of accident trailer arranged by Fayard	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
497	Photos of underride guards that Fayard installed on the Strick trailer	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
498	Violations discovered by TXPDS Commercial Vehicle Enforcement (TX10440EAQ01, CD# 0798253, 5/28/2010	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901 Supplemental Objections: Fed. R. Evid. 401, 402, 403		
499	Documents included with purchase of Strick authorized parts - no instructions	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
500	Photo of Strick part, with label	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
501		Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
502	Photo of Strick underride guard test	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
503	Underride guard P3 test results	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
5 A 1	Photo illustrations of underride guard designs that are welded to cross tube	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		

Ex.	Pls' Description	Objections	G	D
505	Comparison illustrations of underride guards	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
506	Illustration of Strick tested version of underride guard had bolts on the top bracket	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
507	Document - Strick bill of materials that proves they knew trailer was for Dolphin Line (customer)	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
508	Photos of scratch marks on incident Toyota 4Runner on pavement and partial shield	Objection Withdrawn		
509	Photos of Volvo front end and flexible bumper fascia that fell off	Objection Withdrawn		
510	Figure - Comparison of FMVSS Stopping Distance Requirements from 60 mph	Objection Withdrawn		
511	Intentionally Omitted			
512	Excerpt of FE modeling from Toyota Bates 754674-754682			
513	Excerpt of FE modeling from Toyota Bates 754683-754688			
514	Excerpt of FE modeling from Toyota Bates 754689-754697			
515	Passive Safety - Finite Element Modeling	Objection Withdrawn		
516	Excerpt of FE modeling of Toyota partial body	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
517	Excerpt of FE modeling of Toyota 4Runner	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
	2010 vs 2014 Toyota 4Runner rear portion comparison	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
519	Photo of 2010 Toyota 4Runner fuel tank distance to rear axle	Objection Withdrawn		
520	Comparison illustrations 2010 Toyota 4Runner with fuel tank	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
521	Toyota frame, tank, body deformation illustration	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
522	2010 Toyota 4Runner fuel tank with labels and test results	Objection Withdrawn		
523	Photo - side view of driver rear frame - incident 2010 Toyota 4Runner	Objection Withdrawn		

Ex.	Pls' Description	Objections	G	D
524	Photo from Toyota Rav4	Objection Withdrawn		
525	Alternative design of fuel tank placement	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
526	Alternative frame design and fuel tank placement	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
527	Check valve illustrations	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
	Illustration of fuel tanks Toyota vehicles - 1994 4Runner, 2008 Rav4, 2008 Sequoia	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
529	Illustration of fuel tank - 2006 Toyota 4Runner	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
	Test Results and comparison of 2010 Toyota 4Runner with other vehicle fuel system designs	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
531	Exhibit 12 from Keith Friedman Deposition	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
	Illustrations of leak testing, accident scene information, and vehicle characteristics	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
533	Illustrations related to Strick underride guard, including photos of components and scene photos	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
	Illustrations of Toyota 4Runner exemplar fuel system components	Objection Withdrawn		
535	Illustrations of Toyota parts and Strick trailer	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
536	Illustrations related to Strick underride guard, including subject trailer and installation instructions	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
537	illustrations of Strick Toyota and Volvo parts and concepts	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
538	Illustration of 2003 Strick welded underride guard	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
539	Illustration of Toyota part and trailer	Objection Withdrawn		
540	illustration of Toyota 4runners	Objection Withdrawn		
541	illustration of Toyota parts (fuel tank, tank strap and shield)	Objection Withdrawn		
542	illustration of alternative frame designs	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
543	Illustration of Volvo tractor frame and parts	Objection Withdrawn		
544	Illustration of accident vehicle parts	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		

Ex.	Pls' Description	Objections	G	D
545	Illustration of Toyota Fuel Tank Skid Plate Underside Striations	Objection Withdrawn		
546	Illustration of various fuel tanks	Fed. R. Civ. P. 26(a)(3)(a)(iii)		_
547	Illustration of Toyota shield	Objection Withdrawn		
548	Illustration of seat belt usage	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
549	Illustration of accident vehicle fuel tank damage	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
550	Illustration of accident vehicle damage	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
	Illustration of accident vehicle damage (Rear Axle Bracket and Stabilizer Link Impact with Rear of Muffler)	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
552	Illustration of rear axle forward motion	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
553	Illustration of strap bending and rear fuel tank deformation	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
554	Illustration of fuel tank bending and other vehicle damage	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
555	Visual comparison of 2010 and 2014 4Runners	Objection Withdrawn		. •
E E Z	Illustration of locations of fuel tanks by other manufacturers	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
	Radar collision mitigation scenarios (Ex. 26 at Friedman Deposition)	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
	Illustration of vehicle damage to 4Runner and Strick trailer	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
774	Illustration of replacement Strick underride guards	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
560	Illustration of vehicle damage, scene, parts	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
561	Illustration of Toyota parts	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
562	Illustration of Toyota parts	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
563	Illustration of Toyota parts	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
564	Illustration of Toyota parts	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
565	Illustration of Toyota parts	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
566	Illustration of Toyota parts	Fed. R. Civ. P. 26(a)(3)(a)(iii)		

Ex.	Pls' Description	Objections	G	D
567	Illustration of Toyota parts	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
568	Illustration of Toyota parts	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
569	Illustration of Toyota parts	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
570	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
571	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
572	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
573	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
574	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
575	Demonstrative video – 4Runner component parts	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
576	Demonstrative video – 4Runner component parts	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
577	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
578	Demonstrative video – Heavy Truck into 4Runner	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
579	Demonstrative video – Heavy Truck into 4Runner	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
580	Demonstrative video – Heavy Truck into 4Runner	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
7 X I I	Demonstrative video – Heavy Truck into 4Runner	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
582	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
- N V Z I	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
584	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
5X5	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
126	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
587	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		

Ex.	Pls' Description	Objections	G	D
588	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
589	Demonstrative video – Heavy Truck into 4Runner	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
590	Demonstrative video – Heavy Truck into 4Runner	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
591	Demonstrative video – Heavy Truck into 4Runner	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
592	Demonstrative video – Heavy Truck into 4Runner	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
593	Demonstrative video – 4Runner component parts	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
594	Demonstrative video – 4Runner component parts	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
595	Demonstrative video – Heavy Truck into 4Runner	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
	Demonstrative video – Heavy Truck into 4Runner	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
14/	Demonstrative video – 4Runner component parts	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
	Demonstrative video – Heavy Truck into 4Runner	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
599	Demonstrative video – Heavy Truck into 4Runner	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
600	Demonstrative video – 4Runner component parts	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
	Demonstrative video – Heavy Truck into 4Runner	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
602	Demonstrative video – Heavy Truck into 4Runner	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
16114	Demonstrative video – Heavy Truck into 4Runner	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
604	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
605	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
606	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
607	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		

Ex.	Pls' Description	Objections	G	D
608	Demonstrative video – Heavy Truck into 4Runner	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
609	Demonstrative video – Heavy Truck into 4Runner	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
610	Demonstrative video – Heavy Truck into 4Runner	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
611	Demonstrative video – Heavy Truck into 4Runner	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
612	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
613	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
614	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
615	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
616	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
617	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
618	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
619	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
620	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
1671	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
622	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
623	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
624	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
625	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
626	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
627	Demonstrative video – 4Runner fuel system design	Fed. R. Civ. P. 26(a)(3)(a)(iii)		

Ex.	Pls' Description	Objections	G	D
628	Demonstrative video – 4Runner fuel system design	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
629	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
630	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
631	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
632	Demonstrative video – 4Runner into Strick Trailer, ICC dislodged	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
633	Demonstrative video – 4Runner into Strick Trailer, ICC dislodged	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
634	Demonstrative video – 4Runner into Strick Trailer, ICC dislodged	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
635	Demonstrative video – 4Runner into Strick Trailer	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
636	Demonstrative video - psi fill for fuel tank	Fed. R. Civ. P. 26(a)(3)(a)(iii)	-	
637	Demonstrative video - fuel tank leak video	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
638	Demonstrative video – IIHS crash test	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
639	Demonstrative video – IIHS crash test	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
640	Friedman/Stephenson Analysis of Evidence Photo 9	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
641	Friedman/Stephenson Analysis of Evidence Photo 10	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
642	Friedman/Stephenson Analysis of Evidence Photo 11	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
1 6/1 4	Friedman/Stephenson Analysis of Evidence Photo 12	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
644	Friedman/Stephenson Analysis of Evidence Photo 13	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
645	Friedman/Stephenson Analysis of Evidence Photo 14	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
646	Friedman/Stephenson Analysis of Evidence Photo 15	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
647	Friedman/Stephenson Analysis of Evidence Photo 16	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		

Ex.	Pls' Description	Objections	G	D
648	Friedman/Stephenson Analysis of Evidence Photo 17	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
649	Friedman/Stephenson Analysis of Evidence Photo 18	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
650	Friedman/Stephenson Analysis of Evidence Photo 19	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
651	Friedman/Stephenson Analysis of Evidence Photo 20	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
652	Friedman/Stephenson Analysis of Evidence Photo 21	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
653	Friedman/Stephenson Analysis of Evidence Photo 22	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
654	Friedman/Stephenson Analysis of Evidence Photo 23	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
655	Friedman/Stephenson Analysis of Evidence Photo 24	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
656	Friedman/Stephenson Analysis of Evidence Photo 25	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
657	Friedman/Stephenson Analysis of Evidence Photo 26	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
658	Friedman/Stephenson Analysis of Evidence Photo 27	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
659	Friedman/Stephenson Analysis of Evidence Photo 28	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
660	Friedman/Stephenson Analysis of Evidence Photo 29	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
661	Friedman/Stephenson Analysis of Evidence Photo 30	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
662	Friedman/Stephenson Analysis of Evidence Photo 31	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
663	Friedman/Stephenson Analysis of Evidence Photo 32	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
664	Friedman/Stephenson Analysis of Evidence Photo 33	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
665	Friedman/Stephenson Analysis of Evidence Photo 34	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
666	Friedman/Stephenson Analysis of Evidence Photo 35	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901	_	
667	Friedman/Stephenson Analysis of Evidence Photo 36	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		

Ex.	Pls' Description	Objections	G	D
668	Friedman/Stephenson Analysis of Evidence Photo 37	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
669	Friedman/Stephenson Analysis of Evidence Photo 38	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
670	Friedman/Stephenson Analysis of Evidence Photo 39	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
671	Friedman/Stephenson Analysis of Evidence Photo 40	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
672	Friedman/Stephenson Analysis of Evidence Photo 41	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
673	Friedman/Stephenson Analysis of Evidence Photo 42	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
674	Friedman/Stephenson Analysis of Evidence Photo 43	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
675	Friedman/Stephenson Analysis of Evidence Photo 44	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
676	Friedman/Stephenson Analysis of Evidence Photo 45	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
677	Friedman/Stephenson Analysis of Evidence Photo 46	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
678	Friedman/Stephenson Analysis of Evidence Photo 47	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
679	Friedman/Stephenson Analysis of Evidence Photo 48	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
680	Friedman/Stephenson Analysis of Evidence Photo 49	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
681	Friedman/Stephenson Analysis of Evidence Photo 50	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
682	Friedman/Stephenson Analysis of Evidence Photo 51	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
683	Friedman/Stephenson Analysis of Evidence Photo 52	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
684	Friedman/Stephenson Analysis of Evidence Photo 53	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
685	Friedman/Stephenson Analysis of Evidence Photo 54	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
686	Friedman/Stephenson Analysis of Evidence Photo 55	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
687	Friedman/Stephenson Analysis of Evidence Photo 56	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		

Ex.	Pls' Description	Objections	G	D
688	Friedman/Stephenson Analysis of Evidence Photo 57	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
689	Friedman/Stephenson Analysis of Evidence Photo 58	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
690	Friedman/Stephenson Analysis of Evidence Photo 59	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
691	Friedman/Stephenson Analysis of Evidence Photo 60	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
692	Friedman/Stephenson Analysis of Evidence Photo 61	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
693	Friedman/Stephenson Analysis of Evidence Photo 62	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
694	Friedman/Stephenson Analysis of Evidence Photo 63	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
695	Friedman/Stephenson Analysis of Evidence Photo 64	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
696	Friedman/Stephenson Analysis of Evidence Photo 1	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
697	Friedman/Stephenson Analysis of Evidence Photo 2	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
698	Friedman/Stephenson Analysis of Evidence Photo 3	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
699	Friedman/Stephenson Analysis of Evidence Photo 4	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
700	Friedman/Stephenson Analysis of Evidence Photo 5	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
	Friedman/Stephenson Analysis of Evidence Photo 6	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
702	Friedman/Stephenson Analysis of Evidence Photo 7	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
703	Friedman/Stephenson Analysis of Evidence Photo 8	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
704	Illustration of Toyota parts	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
705	Illustration of Toyota parts	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
706	Illustration of Toyota parts	Fed. R. Civ. P. 26(a)(3)(a)(iii)		
707	Photos of cab interior of Daniel Sprinkle's tractor	Objection Withdrawn		
708	Cost information for Toyota fuel tank protectors if purchased from parts seller	Fed. R. Civ. P. 26(a)(3)(a)(iii)		

Ex.	Pls' Description	Objections	G	D
709	February 28, 2011 letter from the Insurance Institute for Highway Safety to National Highway Traffic Safety Administration: Petition for Rulemaking; 49 CFR Part 571 Federal Motor Vehicle Safety Standards; Rear Impact Guards; Rear Impact Protection	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		
710	Insurance Institute for Highway Safety News Release: Underride guards on big rigs often fail in crashes; Institute petitions government for new standard	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		
711	Insurance Institute for Highway Safety Status Report, Bulletin Vol. 46, No. 2, March 1, 2011: Underride Crashes	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		
712	Insurance Institute for Highway Safety Status Report, Bulletin Vol. 47, No. 5, July 3, 2012: Special Issue: Crash Avoidance	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		
713	Insurance Institute for Highway Safety Bulletin Vol. 29, No. 5, April 2012: Volvo collision avoidance features: initial results	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 401, 402, 403, 802, 901		
714	Expert report of Dr. Joseph Burton	Fed. R. Civ. P. 26(a)(3)(a)(iii) Supplemental Objections: Fed. R. Evid. 802		
715	Curriculum Vitae of Dr. Joseph Burton	Fed. R. Civ. P. 26(a)(3)(a)(iii) Supplemental Objections: Fed. R. Evid. 802		
716	Collection of Dr. Burton's Vehicle Inspection Photographs	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		:
717	Dr. Burton Rear Impact Case list	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
718	Dr. Burton Underride Case list	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
719	Dr. Burton Fuel-fed Fires Cases list	Fed. R. Civ. P. 26(a)(3)(a)(iii) Supplemental Objections: Fed. R. Evid. 802		
720	Dr. Burton Lateral Impact Cases list	Fed. R. Civ. P. 26(a)(3)(a)(iii) Supplemental Objections: Fed. R. Evid. 802		
721	Dr. Burton Rear Impact Bibliography	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		

Ex.	Pls' Description	Objections	G	D
722	Dr. Burton Fire / CO Bibliography	Fed. R. Civ. P. 26(a)(3)(a)(iii) Supplemental Objections: Fed. R. Evid. 802		
723	Dr. Burton Side Impact Bibliography	Fed. R. Civ. P. 26(a)(3)(a)(iii) Supplemental Objections: Fed. R. Evid. 802		
724	Dr. Burton Underride Bibliography	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
725	Dr. Burton Head Injury Bibliography	Fed. R. Civ. P. 26(a)(3)(a)(iii) Supplemental Objections: Fed. R. Evid. 802		
726	Dr. Burton Human Tolerance Bibliography	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
727	Dr. Burton Pain & Suffering Bibliography	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
728	Dr. Burton Diagnosis of Seat Belt Usage Bibliography	Fed. R. Civ. P. 26(a)(3)(a)(iii) Supplemental Objections: Fed. R. Evid. 802		
729	Dr. Burton Seat Belt Bibliography	Fed. R. Civ. P. 26(a)(3)(a)(iii) Supplemental Objections: Fed. R. Evid. 802		
730	Dr. Burton Forensic Textbook Bibliography	Fed. R. Civ. P. 26(a)(3)(a)(iii) Supplemental Objections: Fed. R. Evid. 802		
731	Papers authored by Dr. Burton	Fed. R. Civ. P. 26(a)(3)(a)(iii) Supplemental Objections: Fed. R. Evid. 802		
732	Dr. Burton's 4Runner inspection notes	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
733	Timeline of critical dates	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
734	Frank Katz email regarding Canadian bumper and cost per unit	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
735	Frank Katz email regarding Canadian bumper	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
736	Frank Katz email with TTMA information	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		
737	email regarding TTMA conference on Lufkin verdict	Fed. R. Civ. P. 26(a)(3)(a)(iii) Fed. R. Evid. 802, 901		

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on June 18, 2014, the foregoing pleading was filed with the clerk of the court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to all attorneys of record who have consented in writing to accept this Notice as service of documents by electronic means.

/s/ Jacob M. Borchers
Jacob M. Borchers